

United States Bankruptcy Court
Western District of Washington

In re:
Adam R Grossman
Debtor

Case No. 10-19817-MLB
Chapter 7

CERTIFICATE OF NOTICE

District/off: 0981-2

User: cynthiah
Form ID: pdf

Page 1 of 3
Total Noticed: 62

Date Rcvd: Jul 16, 2013

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 18, 2013.

db #Adam R Grossman, 5766 - 27th Ave. NE, Seattle, WA 98105-5512
aty +Jeffrey B Wells, 500 Union Street, Ste. 502, Seattle, WA 98101-2332
aty +M Moburg, Routh Crabtree Olsen PS, 13555 SE 36th St #300, Bellevue, WA 98006-1489
aty +Mark Moburg, Routh Crabtree Olsen PS, 13555 SE 36th St Ste 300, Bellevue, WA 98006-1489
aty +Mark Moburg, Routh Crabtree Olsen PS, 13555 SE 36th St #300, Bellevue, WA 98006-1489
sr +Jill Borodin, c/o Crocker Law Group PLLC, 720 Olive Way #1000, Seattle, WA 98101-1881
sr +Law Office of Matthew D. O'Conner, 8011 Greenwood Ave. N., Seattle, WA 98103-4228
sr +Lyman C Opie, c/o Davis Wright Tremaine, 1201 Third Avenue #2200, Seattle, WA 98101-3047
sp +Stephen Dean, 1610 West Street, Suite 2, Redding, CA 96001-1767
sp +Tsai Law Company, 2101 4th Avenue Suite 1560, Seattle, WA 98121-2316
sr +Wells Fargo Bank NA, Routh Crabtree Olsen, P.S., c/o Mark MoBurg, 13555 SE 36th ST, Suite 300, Bellevue, WA 98006-1489
sr +Wells Fargo Bank, N.A., ROUTH CRABTREE OLSEN, P.S., Jennifer Aspaas, 13555 SE 36th St., Suite 300, Bellevue, WA 98006-1489
952674523 +Abraham Wyner, 1309 Sussex Rd, Wynnewood, PA 19096-2526
953723080 +Arthur Bernstein, 11661 San Vicente Blvd Ste 820, Los Angeles, CA 90049-5116
953584560 ++BANK OF AMERICA, PO BOX 982238, EL PASO TX 79998-2238
(address filed with court: FIA CARD SERVICES, N.A., PO Box 15102, Wilmington, DE 19886-5102)
952674514 +Bank of America, 4161 Piedmont Pkwy, Greensboro, NC 27410-8119
952860697 +Beth Shalom Preschool, 6800 35th Ave NE, Seattle, WA 98115-7334
952860698 +Bugni Law Firm, 11320 Roosevelt Way NE, Seattle, WA 98125-6228
953723505 +CC & L Accounting and Payroll, 1698 Market Street, Redding, CA 96001-1021
952860700 ++CITIMORTGAGE, 5280 CORPORATE DRIVE, BANKRUPTCY DEPARTMENT, ATTENTION MC0023, FREDERICK MD 21703-8351
(address filed with court: Citi Mortgage, 5280 Corporate Drive MC0257, Frederick, MD 21703)
952860699 +California Franchise Tax Board, P.O. Box 942857, Sacramento, CA 94257-0001
952674515 +Chase Bank USA, 800 Brooksedge Blvd., Westerville, OH 43081-2822
952750609 Chase Bank USA, N.A., PO Box 15145, Wilmington, DE 19850-5145
952674518 +Cindy Loegering, PO Box 993115, Redding, CA 96099-3115
952674516 +CitiBank Student Loan, PO Box 22876, Rochester, NY 14692-2876
952860701 +City of Seattle Parking Enforcement, 600 5th Ave, Seattle, WA 98104-1900
953037062 +Congregation Beth Shalom, Early Childhood Center, Attn Tzachi Litov, 6800 35th Avenue NE, Seattle WA 98115-7334
952924048 Franchise Tax Board, Bankruptcy Section MS A340, Sacramento CA 95812-2952
953723062 +Harold J and Cynthia M Hendricks Family Trust, 2410 Heritage Oaks Dr, Alamo, CA 94507-1445
953722738 +Jeff Bernstein, 1916 2nd Ave N, Seattle, WA 98109-2505
952860702 +Jessica Johnson & Michael Bullock, 773 Metro Way, Redding, CA 96003-2765
953198701 +Jill & Brian Reynolds, 9 Laurel Circle, Lutherville, MD 21093-4753
952860705 +Jill & Bryan Reynolds, 66 Echo Way Court, Towson, MD 21286
953722491 +Jill Borodin, Crocker Law Group, 720 Olive Way Suite 1000, Seattle WA 98101-1881
953722946 +Joanna Strober, 14355 Miranda Way, Los Altos, CA 94022-2032
953723066 +John Ettinger, 213 E 73rd St Ph A, New York, NY 10021-3658
953723065 +Lyman Opie, 60 Magazine St, Cambridge, MA 02139-3934
952674520 Lyman Opie, c/o Hugh R McCulough, Davis Wright Tremaine LLP, 1201 Third Avenue Suite 2200, Seattle WA 98101-3045
953723043 +Marc Weitz, 265 Ardsley Rd, Scarsdale, NY 10583-2626
952860703 +Ms. Kerith Lisa, P.O. Box 42691, Tucson, AZ 85733-2691
953198700 +Peter Zieve, 10517 62nd Pl W, Mukilteo WA 98275-4639
953722629 +Ptarmigan Real Estate Fund LLC, 4023 Kennett Pike Ste 134, Greenville, DE 19807-2018
953309566 +Rob Middleton, House of Realty Inc, 1707 Place Street, Redding CA 96001-1715
953722674 +Robert Delles Family Trust, 1911 Sacramento St, San Francisco, CA 94109-3419
953761854 +Shila Clement, 1911 Sacramento Way, San Francisco CA 94109-3419
953198699 +Stephen LeBlanc, c/o Quine Intellectual Property Law Grou, 2033 Clement Avenue, Ste. 200, Alameda, CA 94501-7907
953722543 +Tanager Fund LP, 4001 Kennett Pike Ste 134, Greenville, DE 19807-2000
953723081 +Terrington Davies Capital Management LLC, 4023 Kennett Pike Ste 134, Greenville, DE 19807-2018
953723127 +Terrington Davies LLC, 4023 Kennett Pike Ste 134, Greenville, DE 19807-2018
953309567 Wells Fargo Bank NA, PO Box 6995, Portland OR 97228-6995
952780036 +Wells Fargo Bank, N.A., 3476 Stateview Blvd., MAC # X7801-014, Ft Mill, SC 29715-7203
952738298 Wells Fargo Bank, N.A., Home Equity Group, X2303-01A, 1 Home Campus, Des Moines, IA 50328-0001
952674522 +Wells Fargo Equity Resources, 3476 State View Blvd, Fort Mill, SC 29715-7203
952674521 +Wells Fargo Home Equity, PO Box 31557, Billings, MT 59107-1557

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
sr E-mail/PDF: rmscedi@recoverycorp.com Jul 17 2013 00:51:11 GE Money Bank, c/o Office Manager, Recovery Management Systems Corp, 25 SE 2nd Ave #1120, Miami, FL 33131-1605
952674517 E-mail/PDF: mrdiscen@discoverfinancial.com Jul 17 2013 00:57:53 Discover Card, 12 Reads Way, New Castle, DE 19720
952683338 E-mail/PDF: mrdiscen@discoverfinancial.com Jul 17 2013 00:57:53 Discover Bank, Dfs Services LLC, PO Box 3025, New Albany, OH 43054-3025
952771523 E-mail/Text: cio.bncmail@irs.gov Jul 17 2013 00:47:11 Internal Revenue Service, P.O.Box 21126, Philadelphia, PA 19114

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center (continued)

953089860 +E-mail/Text: USTPREGION18.SE.ECF@USDOJ.GOV Jul 17 2013 00:47:45
Office of the United States Trustee, 700 Stewart Street, Suite 5103, Seattle, WA 98101-4438

952768583 E-mail/PDF: rmscedi@recoverycorp.com Jul 17 2013 00:51:11
Recovery Management Systems Corporation, 25 S.E. 2nd Avenue, Suite 1120,
Miami, FL 33131-1605

952674519 +E-mail/PDF: pa_dc_claims@salliemae.com Jul 17 2013 00:52:31 Sallie Mae, 1002 Arthur Dr.,
Lynn Haven, FL 32444-1683

953614435 +E-mail/PDF: pa_dc_claims@salliemae.com Jul 17 2013 00:52:05 Sallie Mae, c/o Sallie Mae Inc.,
220 Lasley Ave., Wilkes-Barre, PA 18706-1496

TOTAL: 8

***** BYPASSED RECIPIENTS (undeliverable, * duplicate) *****

acc Bruce Devereaux
r House of Realty Inc
r Rob Middleton
cr Wells Fargo Bank NA

aty* +Mark Moburg, Routh Crabtree Olsen PS, 13555 SE 36th St #300, Bellevue, WA 98006-1489
aty* +Mark Moburg, Routh Crabtree Olsen PS, 13555 SE 36th St. #300, Bellevue, WA 98006-1489

953723086 ##+Alexandra Grossman, 5766 27th Ave NE, Seattle, WA 98105-5512

952860704 ##+Michael Powers, 1679 Strause Lane, Redding, CA 96003-7507

953723085 ##+Naomi Grossman, 5766 27th Ave NE, Seattle, WA 98105-5512

TOTALS: 4, * 2, ## 3

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

Addresses marked '++' were redirected to the recipient's preferred mailing address
pursuant to 11 U.S.C. 342(f)/Fed.R.Bank.PR.2002(g)(4).

Addresses marked '#' were identified by the USPS National Change of Address system as requiring an update.
While the notice was still deliverable, the notice recipient was advised to update its address with the court immediately.

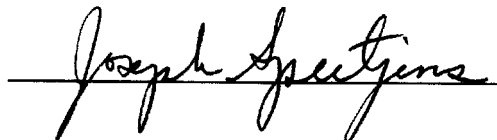
Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The debtor's attorney or pro se debtor was advised that the specified notice was undeliverable.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 9): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jul 18, 2013

Signature:



The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 12, 2013 at the address(es) listed below:

Bradley Boswell Jones on behalf of Creditor Wells Fargo Bank NA bbjlaw301@hotmail.com, wmp935@hotmail.com
 Bruce P. Kriegman on behalf of Trustee Ronald G Brown bkriegman@kriegmanlaw.com, sblan@kriegmanlaw.com
 Denise E Moewes on behalf of Plaintiff Ronald G Brown dmoewes@aol.com, tessmkent@aol.com
 Gloria Z Nagler on behalf of Spec. Counsel Tsai Law Company gloria@naglerlaw.com, rebecca@naglerlaw.com
 Hugh R. McCullough on behalf of Special Request Lyman C Opie hughmccullough@dwt.com, elainehuckabee@dwt.com;seadocket@dwt.com
 Hugh R. McCullough on behalf of Defendant Lyman C Opie hughmccullough@dwt.com, elainehuckabee@dwt.com;seadocket@dwt.com
 Jeffrey B Wells on behalf of Attorney Jeffrey B Wells paralegal@wellsandjarvis.com
 Jennifer L Aspaas on behalf of Special Request Wells Fargo Bank, N.A. ecf@rcolegal.com
 Jennifer L Aspaas on behalf of Creditor PNC Bank, National Association ecf@rcolegal.com
 Jennifer L Aspaas on behalf of Creditor Wells Fargo Bank, N.A. ecf@rcolegal.com
 John H O'Rourke on behalf of Spec. Counsel Tsai Law Company johnhorourke@comcast.net
 Martin L. Smith on behalf of Plaintiff United States Trustee martin.l.smith@usdoj.gov, Young-Mi.Petteys@usdoj.gov;Tara.Maurer@usdoj.gov;Martha.A.VanDraanen@usdoj.gov
 Martin L. Smith on behalf of US Trustee United States Trustee martin.l.smith@usdoj.gov, Young-Mi.Petteys@usdoj.gov;Tara.Maurer@usdoj.gov;Martha.A.VanDraanen@usdoj.gov
 Matthew D. O'Conner on behalf of Special Request Law Office of Matthew D. O'Conner pacer@mdolaw.com, dana@mdolaw.com
 Ronald G Brown rgblaw@nwlinc.com, rgbrown@ecf.epiqsystems.com
 Shelly Crocker on behalf of Special Request Jill Borodin scrocker@crockerlaw.com, thao@crockerlaw.com;nancy@crockerlaw.com;aaron@crockerlaw.com;ecf@crockerlaw.com
 Steven J Reilly on behalf of Special Request Jill Borodin sreilly@crockerlaw.com, thao@crockerlaw.com;nancy@crockerlaw.com;aaron@crockerlaw.com;ecf@crockerlaw.com
 United States Trustee USTPRegion18.SE.ECF@usdoj.gov
 William L. Courshon on behalf of US Trustee United States Trustee bill.l.courshon@usdoj.gov, Young-Mi.Petteys@usdoj.gov;Tara.Maurer@usdoj.gov;Martha.A.VanDraanen@usdoj.gov

TOTAL: 19

Judge Marc L. Barreca
Hearing Location: Room 7106
700 Stewart St., Seattle, WA 98101
Hearing date: August 30, 2013
Hearing time: 9:30 a.m.
Response due: August 23, 2013

UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:) CHAPTER 7
ADAM GROSSMAN,) CASE NO. 10-19817
Debtor.) TRUSTEE'S MOTION FOR ORDER
ALLOWING AND DISALLOWING
CLAIMS AND GRANTING RELATED
RELIEF; AND NOTICE OF HEARING

TO: Creditors, Parties-in-Interest, the Debtor and the Clerk of the Court

I. NOTICE

PLEASE TAKE NOTICE that a hearing on the below motion shall occur on **Friday, August 30, 2013 at 9:30 a.m. before Judge Marc L. Barreca, at the U.S. Bankruptcy Court, in Room 7106, U.S. Courthouse, 700 Stewart Avenue, Seattle, Washington 98101.** The Clerk is requested to note the motion on the docket for that date and time.

YOU ARE FURTHER NOTIFIED that, in accordance with local rules, any response or objection to the motion (including any disagreement with the classification or priority proposed for any claim) must be made in writing and filed with the US Bankruptcy Court, in Room 6301, US Courthouse, 700 Stewart Street, Seattle, Washington 98101; and a copy of any such response or objection must be served upon Judge Barreca via the Court's electronic case filing ("ECF") system or via the Office of the Clerk of the Court and upon the undersigned **no later than the "Responses due" date shown in the upper right hand corner of this pleading (hereinafter, the "Response Date")**. If responses or objections are not timely filed, the Court may strike the hearing and grant the relief requested in the

TRUSTEE'S MOTION AND
NOTICE OF HEARING - 1

KRIEGMAN LAW OFFICE, PLLC
600 University Street, Suite 2100
Seattle, WA 98101
(206) 903-0344

1 motion on an ex parte basis.

2 II. MOTION

3 The Trustee moves the Court for entry of an order as follows: (1) sustaining the Trustee's
4 objections to the claims proposed for disallowance below and disallowing said claims¹; (2) allowing the
5 claims proposed for allowance below; (3) approving the proposed characterization of the claims set forth
6 below in regard to their status as marital community claims or separate claims to account for the
7 treatment of said claims pursuant to §§541(a) and 726(c); and (4) providing that no other claims shall be
8 allowed except as the Court may order at a later date.

9
10 Sections 541(a) and 726(c) establishes a hierarchy within the bankruptcy estate for treatment of
11 estate assets and allowed claims depending upon the status or character of an asset and a claim (i.e.,
12 whether the funds in the bankruptcy estate were derived from property that was an asset of the debtor's
13 marital community or a separate asset of the debtor; and whether a claim was against the debtor's
14 marital community or only against the debtor as a separate liability). *See*, ¶541.11 and ¶726.05 Collier
15 on Bankruptcy (16th ed.) at 541-61 through 541-65 and 726-19 – 726-31. Section 726(c) is construed as
16 establishing "sub-estates" whereby, in general, the character of funds in the estate are matched with
17 claims of similar character. *Id.* Thus, for example, the funds in an estate derived from a debtor's marital
18 community property would be subject to distribution for allowed marital community claims and funds in
19 an estate derived from a debtor's separate property would be subject to distribution for allowed claims
20 that are based upon the debtor's separate liability in regard to such claims.² In the present case, §726(c)
21 may apply and, accordingly, as part of the relief sought in this motion, the Trustee proposes what he
22
23
24

25
26 ¹ The Trustee has filed separate objections/motions as to each of these claims. Those objections are set for hearing on the
27 same date as the hearing on the present motion. The proposed order filed herewith encompasses the relief requested in those
objection and the present motion.

² There is presently about \$99,697.00 in the estate. The extent of all administrative claims and/or the allowance thereof has
yet to be determined. Creditors are advised that it is unknown at this time whether there will be sufficient funds in the estate
to make a distribution to holders of allowed claims beyond administrative claims. Further notice will be issued as to the
foregoing when more definitive information is known in regard thereto.

TRUSTEE'S MOTION AND
NOTICE OF HEARING - 2

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Seattle, WA 98101
(206) 903-0344

believes is the appropriate characterization or status of each claim designated for allowance below.

PLEASE NOTE that the Clerk has assigned a number to each proof of claim filed with the Court and prepared a register of claims ("Claims Register") available for inspection at the Court or accessible via the internet on ECF. The Trustee has examined the proofs of claim appearing on the Claims Register and classified them in accordance with the priorities set forth in the U.S. Bankruptcy Code (hereinafter, the "Code"). *The Trustee has also filed objections/motions as to certain claims (shown as claims proposed for disallowance below).* **If any claim is not listed below, the Trustee has not been informed by the Clerk that such a claim exists and has been properly filed with the Court.** Unless a claimant asserting any such unlisted claim, files and serves an objection or response on or before the Response Date, notifying the Court and the Trustee of the claim and provide satisfactory supporting documentation thereof, such claim cannot be allowed or paid except as may otherwise be provided under applicable law. **PLEASE ALSO NOTE:** The order which the Court ultimately enters allowing the below identified claims proposed for allowance or any other claims may be materially different from the order as proposed herein depending upon, among other things, responses or objections to the motion contained herein and the Court's disposition thereof. The Court may rule that additional or other claims may be allowed and added to the below claims proposed for allowance.

A. CLAIMS PROPOSED FOR DISALLOWANCE³

The Trustee has filed objections to the allowance of the following claims for the reasons stated in the objections/motions he has filed separately herewith and proposes that said claims be disallowed in full, regardless of claims classification, as follows:

³ The Court entered orders on September 10, 2012 [Docket No. 423] and October 1, 2012 [Docket No. 441] disallowing Claim Nos. 18 through 33 have been disallowed. This motion and the accompanying objections/motions address all other claims appearing in the Claims Register.

Secured Claims

<u>Claim No.</u>	<u>Claimant</u>	<u>Amount</u>
2-1	Wells Fargo Bank, N.A.	\$87,255.10
8-1	Wells Fargo Bank, N.A.	63,440.15
Total:		\$150,695.25

Domestic Support Obligation Claim (11 U.S.C. §507(a)(1)(A) or (a)(1)(B))

<u>Claim No.</u>	<u>Claimant</u>	<u>Amount</u>
17-1	Jill Borodin	\$53,340.12

Cost of Administration Claim (11 U.S.C. §507(a)(2))

<u>Claim No.</u>	<u>Claimant</u>	<u>Amount</u>
16-1 ⁴	Lyman C. Opie	\$238,504.64

Unsecured Priority Tax Claim (11 U.S.C. §507(a)(8))

<u>Claim No.</u>	<u>Claimant</u>	<u>Amount</u>
7-1 ⁵	Department of the Treasury/Internal Revenue Service (IRS)	\$5,114.30

General Unsecured Claims

<u>Claim No.</u>	<u>Claimant</u>	<u>Amount</u>
4-1 ⁶	Chase Bank USA, N.A. (ref# 6457)	\$5,047.70
14-1	Peter Zieve	120,000.00
34-1	Abraham Wyner	10,000.00
Total:		\$130,000.00

⁴ This claim also includes a claim classified as a general unsecured claim. The Trustee has objected to allowance of the entire claim subject to the Claimant supplementing its claim to cure deficiencies which have been identified in the Trustee's objection.

⁵ By letter dated February 13, 2013 which the IRS filed with the Court [Docket No. 487], the IRS stated that its Claim No. 7-1 was no longer in force and effect. Claim No. 7-1, in any event, is duplicative of the IRS' Claim No. 6-1 which is proposed for allowance below. Based upon the IRS' letter, no objection to Claim 7-1 is required and Claim No. 7-1 must be disallowed in accordance with the IRS' statement.

⁶ Claimant filed an amended claim, Claim No. 4-2, which supersedes Claim No. 4-1 and thus Claim No. 4-1 must be disallowed. Claim No. 4-2 is proposed for allowance below.

1 B. CLAIMS PROPOSED FOR ALLOWANCE

2 The Trustee proposes the allowance and characterization of claims as follows:

3 1. Chapter 7 Costs of Administration Claim⁷

4 The Trustee proposes to allow the following claims as Chapter 7 costs of administration and
5 characterized as marital community and/or as a separate obligation payable from the proceeds of either
6 separate or community property liquidated by the Trustee:
7

<u>Claim No.</u>	<u>Claimant/Address</u>	<u>Amount</u>
11-1	Office of the United States Trustee	\$975.00
12-1	Office of the United States Trustee	1,625.00
	Total:	<u>\$2,600.00</u>

12 2. Unsecured Priority Tax Claim (11 U.S.C. §507(a)(8))

13 The Trustee proposes to allow the following claim as a priority unsecured tax claim and
14 characterized as a marital community obligation payable from the proceeds of community property
15 liquidated by the Trustee:
16

<u>Claim No.</u>	<u>Claimant/Address</u>	<u>Amount</u>
6-1	Department of the Treasury/Internal Revenue Service (IRS)	\$5,114.30

20 3. General Unsecured Claims

21 The Trustee proposes to allow the following claims as general unsecured claims and
22 characterized as marital community obligations payable from the proceeds of community property
23 liquidated by the Trustee:
24

<u>Claim No.</u>	<u>Claimant/Address</u>	<u>Amount</u>
1-1	Discover Bank (ref# 0579)	\$6,416.20

27
⁷ The Trustee believes that these administrative expenses are in effect not subject to any limitations under §726(c) and thus no characterization is proposed in regard thereto.

<u>Claim No.</u>	<u>Claimant/Address</u>	<u>Amount</u>
3-1	Chase Bank USA N.A. (ref# 3915)	22,281.77
4-2	Chase Bank USA, N.A. (ref# 6457)	5,046.12
5-1	Chase Bank USA N.A. (ref# 7314)	5,285.93
9-1	Franchise Tax Board (California)	11,715.52
10-1	Congregation Beth Shalom: Early Childhood Center Attn: Tzachi Litov	11,148.00
13-1	FIA Card Services, NA, successor to Bank of America and MBNA America Bank (ref# 1484)	35,533.82
15-1	Sallie Mae c/o Sallie Mae Inc.	70,119.76
Total:		<u>\$167,547.12</u>

An order will be entered at a later date authorizing disbursement of funds of the estate for payment of allowed claims. After the Trustee pays Chapter 7 costs of administration as allowed by the Court (the exact amount of which cannot be stated at this time), he will pay the claims identified above under "Claims Proposed for Allowance" and such other claims as the Court determines should be allowed. Claims will be paid by priority, pursuant to Code §§ 503, 507, and 726 and other applicable law, with claims in a higher priority fully satisfied before any payment is made on the claim(s) in a lower priority. If after payment of claims in all higher priorities, there are insufficient funds to fully satisfy claims of the next priority, the claimant(s) in that priority shall share the remaining funds pro rata.

TRUSTEE'S MOTION AND
NOTICE OF HEARING - 6

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600 University Street, Suite 2100
Seattle, WA 98101
(206) 903-0344

III. CONCLUSION

The Trustee, therefore, requests that the Court enter an order granting the relief as requested above.

DATED this 12th day of July, 2013

KRIEGMAN LAW OFFICE, PLLC

/s/ Bruce P. Kriegman

Bruce P. Kriegman, WSBA #14228
Attorney for Trustee